MCI Telecommunications Corporation

MCI

1801 Pennsylvania Avenue, NW
Washington, DC 20006
202 887 2048

Leonard S. Sawicki
Director
FCC Affairs

EX PARTE

October 28, 1996

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street NW
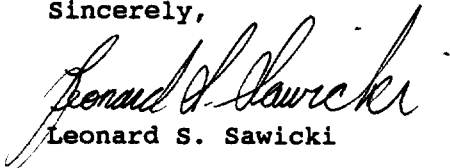Washington, D.C.   20554

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OCT 28 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket 95-116: Local Number Portability

Dear Mr. Caton:

Today, Beth Kistner and I met with Carol Mattey and Richard Metzger of the Common Carrier Bureau. The purpose of the meeting was to review MCI's position in this proceeding. The attached material was used during the meeting and details the matters discussed.

Sincerely,

Leonard S. Sawicki

Attachment

cc: Ms. Mattey
      Mr. Metzger

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List ABCDE

QOR is *STILL* Wrong — ILEC Cost Estimates

- QOR cost savings estimates are unsubstantiated and exaggerated.

- ILEC cost studies either contain little or no support (Bell Atlantic, BellSouth, NYNEX, SBC, GTE), or support is withheld from public scrutiny all together (Pacific).

- Based on minimal information available (including previous Pacific cost study submitted in California), costs of LRN are exaggerated, while significant QOR costs are excluded.
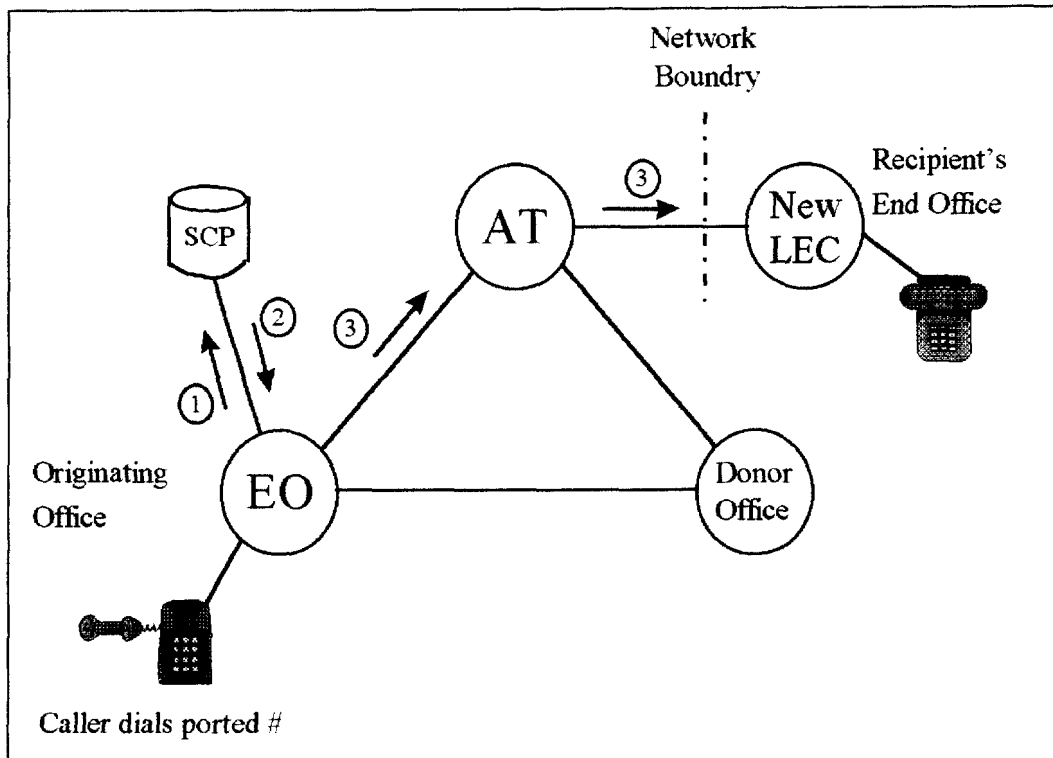
    Studies:
    - * Exaggerate number of SCP pairs needed
    - * Exaggerate LRN impact on switch processor capacity
    - * Fail to account for QOR impact on switch processor capacity
    - * Fail to account for QOR software costs
    - * Exaggerate speed of LNP deployment outside of top 100 MSAs
    - * Exaggerate number of queries from non-participating networks, and fail to assume offsetting revenues

QOR is *STILL Wrong -- Technical Considerations*

- ILECs present no new technical information on which to base reconsideration.

- QOR deployed just in incumbent's network, or between consenting networks, still subjects CLEC calls to different and inferior treatment — See Call Flow diagrams.

- All carriers acknowledge QOR results in more PDD for ported and non-ported calls — perceptibility to end users is not the issue.

- ILEC claim that impacts of QOR can be isolated in ILEC network is false. On calls between two networks, ILEC originating call is CLEC terminating call.

- Additional PDD and network routing with QOR results in additional dropped calls/call blocking and reduced reliability — *but only for ported calls.*

- QOR between "consenting" carriers inserts additional network, unrelated to call origination or termination, into ported call routing — See Call Flow diagrams.

- Impact of QOR query loads on SS7 network, while smaller than impact under LRN, is much more difficult to predict. With QOR, SS7 engineering will have to be based on predictions about how many customers, with what calling characteristics, will port at what points in time. Potential miscalculation (e.g., under-engineering of SS7 links, SCPs, and STPs) could result in less network reliability and call failures --.*but only for ported calls.*
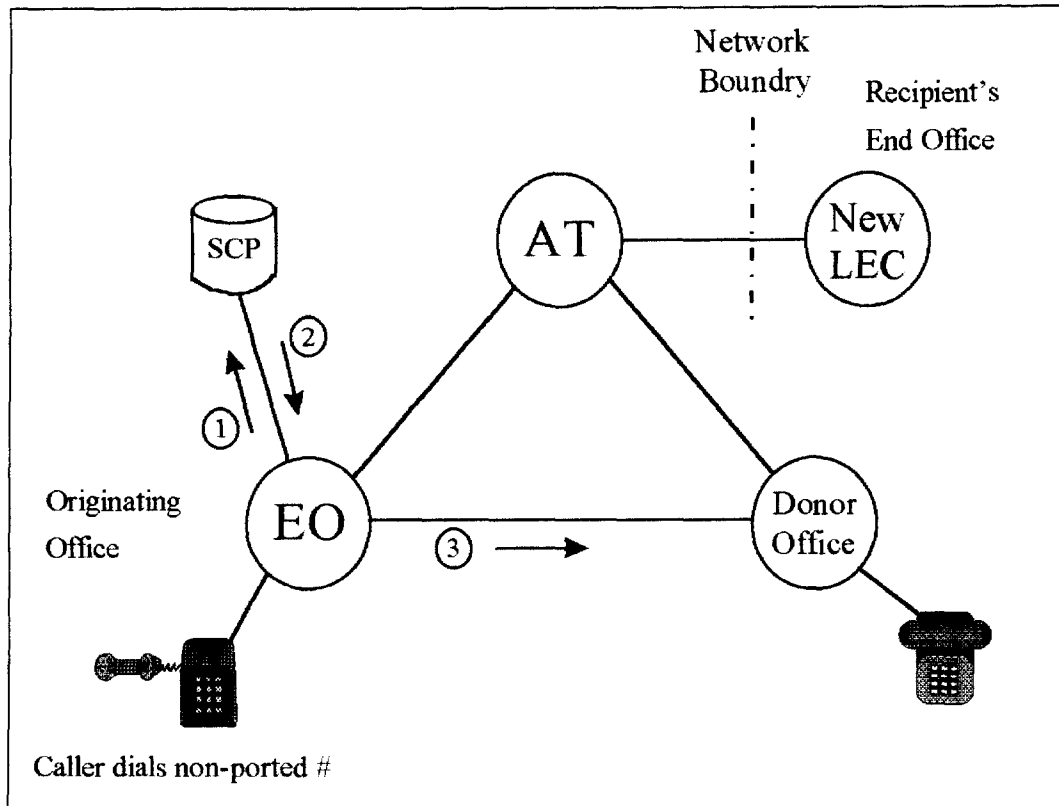
LRN Call Flows

Network
Boundry

SCP

AT   ③   New
LEC   Recipient's
          End Office

②   ③

①

Originating
Office   EO   Donor
                                                      Office

Caller dials ported #

Call from a LNP capable switch to a ported subscriber using LRN

This is the case when an intermediate switch is between the originating switch doing the LNP database dip and the Recipient switch. This assumes that the call is a local call.

1. The originating End Office recognizes the dialed NPA-NXX as portable and sends a query to the LNP SCP.
2. The SCP returns the Location Routing Number (LRN) of the Dialed Number.
3. The originating office routes the call to the recipient's end office.
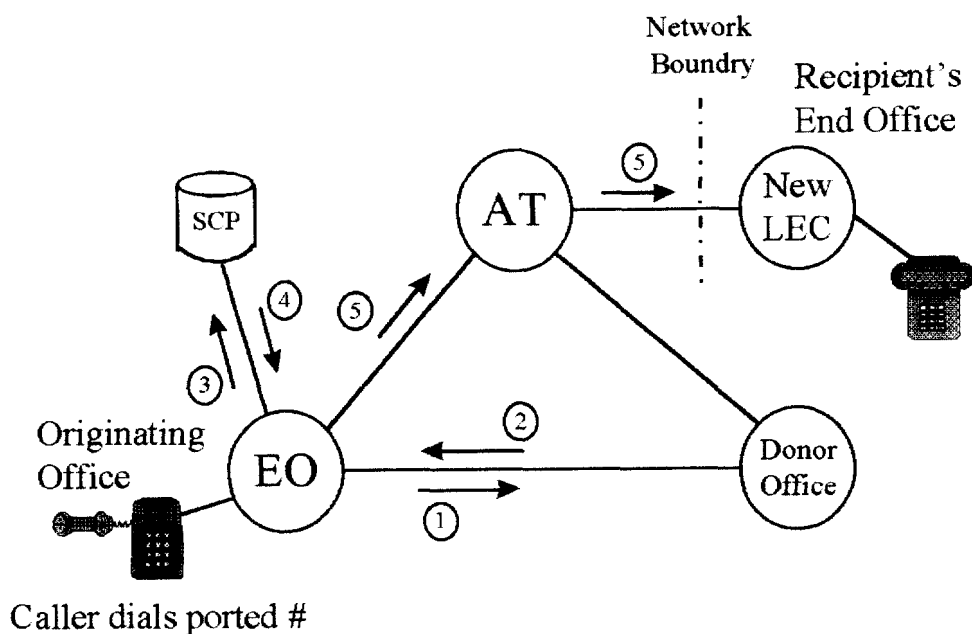
Call from a LNP capable switch to a non-ported subscriber using LRN

This is the case when an intermediate switch is between the originating switch doing the LNP database dip and the Recipient switch. This assumes that the call is a local call.

1. The originating End Office recognizes the dialed NPA-NXX as portable and sends a query to the LNP SCP.
2. The SCP returns the Dialed Number.
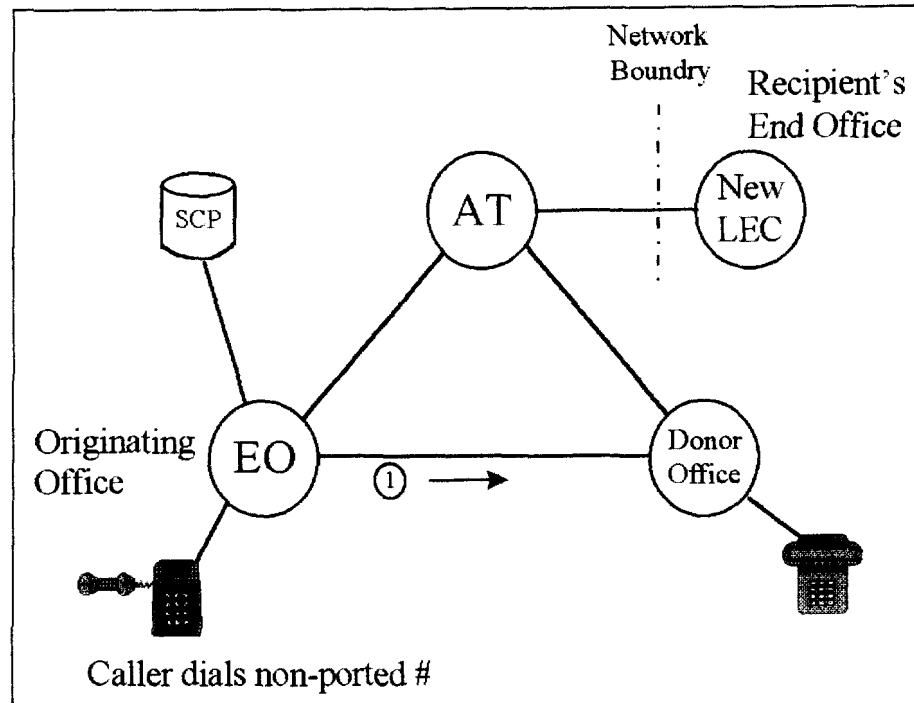3. The originating office routes the call to the donor end office.

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QoR Call Flows

Network Boundry

Recipient's End Office

SCP · AT · New LEC

Originating Office · EO

Donor Office

Caller dials ported #

Call from a LNP capable switch to a ported subscriber using QoR
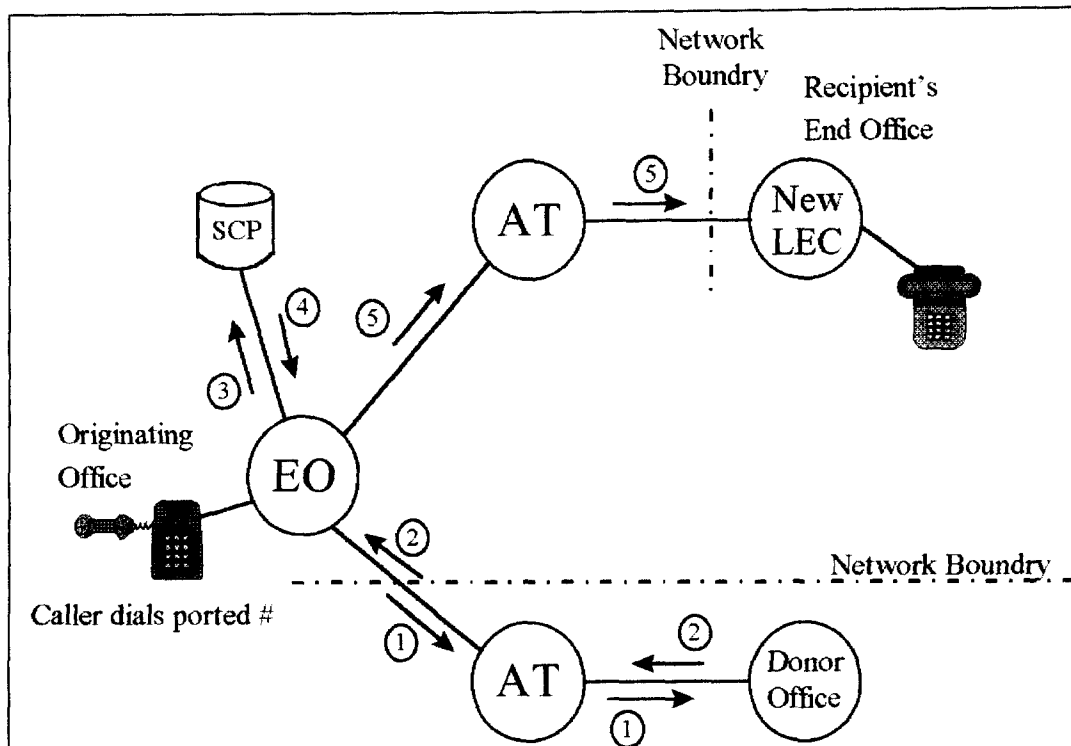
In the above network scenario

1. The originating End Office attempts to set up the call to the donor switch by sending an ISUP IAM message. The dialed number and the FCI are sent to the donor switch as part of the normal call set up
   - the FCI prevents the receiving switch from launching an LNP query
   - for non-ported numbers, the call is completed
   If the DN is not found at the donor switch, the call is released.

2. A Release with cause value = unallocated DN is returned to the originating switch.
3. The LNP trigger is hit once Query-on-Release is completed for a ported number, i.e., upon receiving a Release message with cause = unallocated DN, the originating office sends a query to the LNP SCP.
4. The SCP returns the Location Routing Number (LRN) of the Dialed Number.
5. The originating office routes the call to the recipient's end office.

Call from a LNP capable switch to a non-ported subscriber using QoR

In the above network scenario

1. The originating End Office attempts to set up the call to the donor switch by sending an ISUP IAM message. The dialed number and the FCI are sent to the donor switch as part of the normal call set up
   - the FCI prevents the receiving switch from launching an LNP query
   - the call to the non-ported number is completed

Call from a LNP capable switch to a ported subscriber using QoR

Originating and Donor Offices belong to "consenting" QoR carriers in unrelated networks

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